

**From:** [PETERSON Jenn L](mailto:PETERSON.Jenn.L)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](mailto:Eric.Blischke/R10/USEPA/US@EPA)  
**Subject:** RE: Friday's Benthic Call  
**Date:** 10/26/2010 08:27 AM

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Hi Eric,

I understand your comments on modeling the same endpoints with the same dataset - this is very important. In addition to those you mentioned, I also think there are important differences between the two processes on how outliers are handled (FPM all are retained; LRM has a process for removing them). Just keep in mind that in order for us to evaluate the applicability of the FPM in the same way Jay has evaluated relationships between sediment and toxicity they will have to run it several different ways upfront. We don't have this exploratory analysis for the FPM. Instead, the LWG seems stuck on only running a dry weight model with a limited list of chemicals. We have no support that this is the best fit between chemistry and toxicity. Most of our comments were geared toward getting this back up to ensure that the most relevant FPM was developed and that it can be supported as a useful tool for decision making.

Jennifer

---Original Message-----

From: [Blischke.Eric@epamail.epa.gov](mailto:Blischke.Eric@epamail.epa.gov) [mailto:[Blischke.Eric@epamail.epa.gov](mailto:Blischke.Eric@epamail.epa.gov)]  
Sent: Monday, October 25, 2010 1:59 PM  
To: PETERSON Jenn L  
Subject: Re: Friday's Benthic Call

Jennifer, I think that one of the key issues we need to figure out is where to go from here with respect to the FPM. While I agree that the models are very different, we need to reach agreement about the data that goes into the models. For example, there should not be any discrepancy as to what is a hit vs. not a hit. If we are looking at a level 2 and 3 model for one, we should be looking at a level 2 and 3 model for the other. I think we should also be consistent with respect to pooling.

The first step in this process will be to have a common understanding as to what is a hit vs. not a hit. Secondly, we will figure out how we will define hits for each of the models - I think these should be consistent. Third, we will figure out what changes need to be made in both the LRM and the FPM. Fourth, we will re-run the models and evaluate the output using a common set of reliability statistics based on true hits, true no-hits, predicted hits and predicted no-hits. Fifth, we will evaluate these models in the risk characterization section of the BERA. Sixth, we will use the results of the risk characterization to establish cleanup levels for the PH FS.

I do not agree with your comment about the FPM being run even if there is no relationship between concentration and toxicity. This is not unique to the FPM but also applies to the LRM. Further, we have stated that the FPM should not include chemicals for which there is no statistical difference between the hit and no-hit distributions. I would think the same standard applies to the LRM.

Overall, I want us to reach agreement on what changes need to be made in the FPM. I will be sitting down with Burt to chart a path forward. In the end, there may be some comments that we made regarding the FPM that we decide are not worth pursuing because they will not appreciably change the model results. However, at this time, all our comments still stand.

My biggest concern is that Jay seems to do whatever he wants whereas we hold the FPM to a different standard; I will not accept a double standard when it comes to these models.

Eric

From: "PETERSON Jenn L" <[PETERSON.Jenn@deq.state.or.us](mailto:PETERSON.Jenn@deq.state.or.us)>  
To: [Eric Blischke/R10/USEPA/US@EPA](mailto:Eric.Blischke/R10/USEPA/US@EPA)  
Date: 10/25/2010 08:47 AM  
Subject: Friday's Benthic Call

Hi Eric,

I listened in to the call on Friday, but I couldn't participate. There were several points made about where the FPM analysis should go from here, and that some comments may need to be discussed or re-visited. I think we should talk about this, as I agree with Burt. Both models do not have to be the same, and in fact they are very different. The biggest difference is that the FPM can be run even if there is no relationship between sediment and toxicity. The only acceptability criteria used are reliability criteria, not model calibration. There are several other nuances that should be discussed, before decisions are made to change comments on the FPM. Can you let me know how this is proceeding?

Jennifer

